

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 21-CR-245 (NEB/JFD)

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	DEFENDANT’S LIMINE
v.)	MOTIONS
Muse Mohamud Mohamed,)	
)	
Defendant.)	

Pursuant to the January 20, 2022, Trial Notice and Pretrial Order [Docket No. 34], the defendant Muse Mohamud Mohamed, through his attorney Charles F. Clippert, moves the Court for an Order preventing the Government from offering the following evidence.

1. Evidence from Mr. Mohamed’s appearance before the grand jury on September 30, 2021. The substance of Mr. Mohamed’s testimony from September 30, 2021 is irrelevant. Fed. R. Evid. 401. Even if the evidence is relevant the evidence should be excluded because it would confuse the issue and mislead the jury. Fed. R. Evid. 403.
2. Evidence that Mr. Mohamed was listed as a witness on three additional ballots not charged in the indictment. The evidence is irrelevant. Fed. R. Evid. 401. The fact that Mr. Mohamed was a lawful witness on three other additional balance does not make it more likely than not that he made material misrepresentations to the grand jury. Even if the evidence is relevant the evidence should be excluded because it would confuse the issue and mislead the jury. Fed. R. Evid. 403.

Dated: April 19, 2022

Respectfully submitted,

/s/ Charles F. Clippert

BY: Charles F. Clippert
Attorney for Defendant